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**Draft Environmental Restoration
RFCA Standard Operating Protocol
for Routine Soil Remediation
FY04 Notification #04-07
IHSS Group 700-10, PAC 700-1101
(Laundry Tank Overflow-Building 732)**



November 2003

ADMIN RECORD

IA-A-001840

1/14

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RFCA Standard Operating Protocol
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FY04 Notification #04-07
IHSS Group 700-10, PAC 700-1101
(Laundry Tank Overflow-Building 732)**

Approval received from the Colorado Department of Public Health and Environment

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Approval letter is contained in the Administrative Record

November 2003

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ACRONYMS

AL	action level
BM+2SD	background means plus two standard deviations
D&D	Decontamination and Decommissioning
DOE	U S Department of Energy
ECO	Ecological Receptor
ER	Environmental Restoration
ER RSOP	Environmental Restoration RFCA Standard Operating Protocol
FY	Fiscal Year
IA	Industrial Area
IASAP	Industrial Area Sampling and Analysis Plan
IHSS	Individual Hazardous Substance Site
nCi/g	nanocuries per gram (nano = 10^{-9})
PAC	Potential Area of Concern
PCOC	potential contaminant of concern
POC	Point of Compliance
POE	Point of Evaluation
RCRA	Resource Conservation and Recovery Act
RFCA	Rocky Flats Cleanup Agreement
RFETS	Rocky Flats Environmental Technology Site
RSOP	RFCA Standard Operating Protocol
SAP	Sampling and Analysis Plan
SSRS	Subsurface Soil Risk Screen
UBC	Under Building Contamination
WRW	wildlife refuge worker

1.0 INTRODUCTION

This Environmental Restoration (ER) Rocky Flats Cleanup Agreement (RFCA), Standard Operating Protocol (RSOP) for Routine Soil Remediation (ER RSOP) Fiscal Year (FY) 04 Notification addresses the remediation of Individual Hazardous Substance Sites (IHSSs) at the Rocky Flats Environmental Technology Site (RFETS) Industrial Area (IA). The purpose of this Notification is to invoke the ER RSOP for IHSS Group 700-10 which consists of Potential Area of Concern (PAC) 700-1101 (Laundry Tank Overflow – Building 732). PAC 700-1101 is the only IHSS, PAC, or Under Building Contamination (UBC) site within IHSS Group 700-10. Activities specified in the ER RSOP (DOE 2003a) are not reiterated here, however, deviations from the ER RSOP are included where appropriate.

Soil with contaminant concentrations greater than the RFCA Action Levels (ALs), or as indicated by the Subsurface Soil Risk Screen (SSRS) and associated debris will be removed in accordance with RFCA (DOE et al 1996, 2003) and the ER RSOP (DOE 2003a).

IHSS Group 700-10 is shown on Figure 1 and the potential remediation sites covered under this ER RSOP Notification #04-07 are listed in Table 1 and shown in Figure 2.

Table 1
Potential Remediation Areas for IHSS Group 700-10

IHSS Group	IHSS/PAC/UBC Site	PCOCs	Media	Estimated Remediation Volume
700-10	PAC 700-1101	Radionuclides	Subsurface Soil	3.5 cubic yards

2.0 IHSS GROUP 700-10, PAC 700-1101

No soil analyses have been performed within IHSS Group 700-10, PAC 700-1101.

2.1 Potential Contaminants of Concern

Radionuclides are the only Potential Contaminants of Concern (PCOCs) at PAC 700-1101. The PCOCs at PAC 700-1101 were determined based on process knowledge (DOE 1992-2003, 2003b). Low-level radioactive laundry and floor drain (non-process line) water was the only potentially contaminating media handled within PAC 700-1101. As mentioned below, some laundry water overflowed a tank within the underground part of PAC 700-1101.

2.2 Project Conditions

The following conditions exist at IHSS Group 700-10

- IHSS Group 700-10, PAC 700-1101, consists of Building 732 (Figure 2) Building 732 is a buried concrete stairwell approximately 7 x 17 6 feet in area and 8 feet high. The stairwell goes down to the south and then opens to the east into an underground concrete room 14 x 27 7 feet in extent. Undisturbed earth below the room is approximately 13 75 feet below current grade. Within the room is a 1,000-gallon fiberglass holding tank (T-4), two pumps, and two banks of particulate filters. In the southeastern corner of the room is a sump (1 5 x 1 5 feet in area and 2 feet deep). At the time of construction, the walls of Building 732 were waterproofed on the inside and outside and in the early 1990's additional sealing was applied to all exterior wall, ceiling, and floor joints.
- In the past, under normal operations laundry water and water from floor drains in Building 778 were pumped to Building 732, filtered, and passed on to Valve Vault 9, eventually reaching Building 374 for treatment. Water collected in the 732 sump was pumped back to a secondary containment sump in Building 778. From there it was returned to the tank in Building 732.
- In June 1979 laundry wastewater in tank T-4 overflowed onto the room floor due to malfunctioning pumps that normally send the wastewater through the filters. Records do not indicate whether the sump was able to pump the overflow back to Building 778 or whether additional secondary pumping was necessary. It is possible that laundry wastewater was released to the environment. Because of the nature of building activities, it is probable that this material may have been a low-level waste (DOE 1992-2003).

2.3 RFCA Subsurface Soil Risk Screen Evaluation

An SSRS is performed when non-radionuclides and uranium are present in the soil below 6 inches from the ground surface, when americium and plutonium are present below 3 feet from the ground surface, and for soil beneath below-grade structures. Current site conditions are evaluated to determine if remediation is required by the SSRS.

No soil analyses have been performed within IHSS Group 700-10. Hence, the SSRS evaluation will be performed upon receipt of data from sampling characterization in accordance with Industrial Area (IA) Sampling and Analysis Plan (SAP) (IASAP) Addendum #IA-04-07, and results will be documented in a data summary or closeout report.

2.4 Remediation Plan

This RSOP Notification remediation plan for IHSS Group 700-10 includes the following objectives:

- Remove Building 732 structure and components within three feet of final grade either under the Building 707 Project decision document or this document
- Remove soil with non-radionuclide or uranium contaminant concentrations greater than the RFCA wildlife refuge worker (WRW) ALs to a depth of 6 inches. If soil contamination greater than the ALs extends below 6 inches in depth, perform the SSRS to evaluate the need for further accelerated action
- Remove soil with plutonium-239/240 or americium-241 activities greater than the RFCA WRW AL to a depth of three feet, or to less than the applicable AL, whichever comes first. If activities are greater than 3 nanocuries per gram (nCi/g) between 3 and 6 feet, characterize and remediate pursuant to RFCA Attachment 5 (DOE et al 2003b). If plutonium-239/240 or americium-241 is present at activities greater than the RFCA WRW AL but less than 3 nCi/g below 3 feet, conduct an SSRS
- Consult with regulatory agencies if contaminant concentrations are greater than the proposed Ecological Receptor (ECO) ALs but lower than the WRW ALs
- If contaminated soil is removed, collect confirmation soil samples in accordance with the Industrial Area Sampling and Analysis Plan (DOE 2001a)

It is anticipated that after remediation there may be areas with concentrations of metals, radionuclides, and organics greater than background means plus two standard deviations or method detection limit or reporting limit, but below RFCA ALs

2.5 Stewardship Evaluation

Based on the PCOCs (Table 1) and the ER RSOP (DOE 2003a), it is anticipated that all contamination above RFCA ALs will be remediated. Figure 2 shows the potential remediation areas in the IHSS Group

The following sections present the stewardship evaluation. If remediation is conducted, an additional stewardship evaluation will be conducted during remediation using the consultative process and will be documented in a closeout report for IHSS Group 700-10. A new map of residual contamination will be generated after remediation.

2.5.1 Proximity to Other Contaminant Sources

IHSS Group 700-10 is located within the RFETS IA close to other contaminant sources. IHSS Group 000-2 includes IHSS 000-162, which surrounds IHSS Group 700-10. IHSS Group 700-3 contains IHSS 700-150 2 (S) and IHSS 700-150 7. IHSS 700-150 2 (S) lies north of IHSS Group 700-10, and IHSS 700-150 7 lies to the east. IHSS Group 500-3 contains IHSS 500-159, which lies to the south.

2.5.2 Surface Water Protection

Surface water protection includes the following considerations

Is there a pathway to surface water from potential erosion to streams and drainages?

It is unlikely that subsurface soil contaminants from IHSS Group 700-10 buried beneath Building 732 (13 75 feet) could migrate to surface water via erosion

Do characterization data indicate there are contaminants in surface soil?

No analyses of soil derived from IHSS Group 700-10 are available, however, PAC 700-1101 is not a potential surface contamination site. Radionuclide analyses of surface soil from locations SS452694 and SS452794 in IHSS Group 000-2 (approximately 50 feet away) did not detect activities above background mean plus two standard deviations (BM+2SD) or RFCA ALs (Figure 2)

Do monitoring results from Points of Evaluation (POEs) or Points of Compliance (POCs) indicate there are surface water impacts from the area under consideration?

Analytical results from GS10 (a POE) indicate that there is a low level actinide source somewhere in its drainage (DOE 2003d). The occurrences of actinides at GS10 are seasonal, reoccurring in the spring since 1997. Detailed studies have not been able to pinpoint the sub-drainage contributing the actinides present at GS10 (DOE 2001b). Decontamination and decommissioning (D&D) activities in the IA are not expected to contribute additional actinides to South Walnut Creek, but monitoring will continue (DOE 2003d).

Is the IHSS Group in an area with high erosion potential, based on the 100-Year Average Erosion Map?

IHSS Group 700-10 is not located in an area subject to high erosion in accordance with RFCA Attachment 5—Figure 1 (DOE et al 2003)

2.5.3 Monitoring

Monitoring includes the following considerations

Do monitoring results from POEs or POCs indicate there are groundwater impacts from the area under consideration?

Groundwater samples from monitoring wells 60299 and 60399, approximately 50 feet downgradient of PAC 700-1101, contain one or more of the following compounds: tetrachloroethene, trichloroethene, 1,2-dichloroethene, or carbon tetrachloride (DOE 2002) (Figure 2). Radionuclides have not been detected above the BM+2SD, and radionuclides are the only PAC 700-1101 PCOCs.

Can the impact be traced to a specific IHSS Group?

Wells in the area of PAC 700-1101 did not contain radionuclide activities above background means plus two standard deviations. Impacts with respect to tetrachloroethene, trichloroethene, 1,2-dichloroethene, and carbon tetrachloride can not be traced specifically to IHSS Group 700-10. The 2001 Annual Groundwater Monitoring Report (DOE 2002) examined data for wells in the area of PAC 700-1101 and showed that source areas for the tetrachloroethene, trichloroethene, and carbon tetrachloride present in the area do not coincide with IHSS Group 700-10.

Are additional monitoring stations needed?

Additional monitoring stations are not needed at this time. The need for and placement of monitoring stations will be re-evaluated in the *Long-Term Stewardship Plan*.

Can existing monitoring locations be deleted if additional remediation is conducted?

No, wells in this location monitor areas other than IHSS Group 700-10.

2.5.4 Stewardship Actions and Recommendations

The current stewardship actions and recommendations for IHSS Group 700-10 is as follows:

- Use Best Management Practices to reduce erosion into surface water drainage
 - Implement near-term institutional controls until final closure and stewardship decisions are implemented, including the following
 - Fencing and signs to restrict access, and
 - Soil excavations controlled through the Site Soil Disturbance Permit process
 - Implement long-term stewardship actions, including the following
 - Prohibitions on construction of buildings in the IA,
 - Restrictions on excavations or other soil disturbance, and
 - Prohibitions on groundwater pumping in the area of IHSS Group 700-10

These recommendations may change based on in-process remediation activities and other future RFETS remediation decisions.

2.6 Accelerated Action Remediation Goals

ER RSOP remedial action objectives include the following:

- 1 Provide a remedy consistent with the RFETS goal of protection of human health and the environment,
- 2 Provide a remedy that minimizes the need for long-term maintenance and institutional or engineering controls, and
- 3 Minimize the spread of contaminants during implementation of accelerated actions

2.7 Treatment

Not applicable

2.8 Project-Specific Monitoring

High-volume air samplers may be used at the remediation area consistent with work controls to determine airborne radioactivity concentrations. Approximate locations of air samplers are shown on Figure 2

2.9 Resource Conservation and Recovery Act (RCRA) Units and Intended Waste Disposition

Not applicable

2.10 Administrative Record Documents

DOE, 1992-2003, Historical Release Reports for the Rocky Flats Plant, Golden, Colorado, June

DOE, CDPHE, EPA, 1996, Final Rocky Flats Cleanup Agreement, U S Department of Energy, Colorado Department of Public Health and Environment, and U S Environmental Protection Agency, Rocky Flats Environmental Technology Site, Golden, Colorado, July

DOE, CDPHE, EPA, 2003, Modifications to the Rocky Flats Cleanup Agreement Attachment, U S Department of Energy, Colorado Department of Public Health and Environment, and U S Environmental Protection Agency, Rocky Flats Environmental Technology Site, Golden, Colorado, June

DOE, 1999, RFCA Standard Operating Protocol for Recycling Concrete, Rocky Flats Environmental Technology Site, Golden, Colorado, September

DOE, 2000, Industrial Area Data Summary Report, Rocky Flats Environmental Technology Site, Golden, Colorado, September

DOE, 2001a, Industrial Area Sampling and Analysis Plan, Rocky Flats Environmental Technology Site, Golden, Colorado, June

DOE, 2001b, Final Source Evaluation Report for Point of Evaluation GS10 Water Years 2000-2001, RF/EMM/WP-01-003 UN, August

DOE, 2002, Final Annual RFCA Groundwater Monitoring Report, 02-RF-01873, November

DOE, 2003a, Environmental Restoration RFCA Standard Operating Protocol for Routine Soil Remediation, Rocky Flats Environmental Technology Site, Golden, Colorado, September

DOE, 2003b, Waste Stream and Residue Identification and Characterization – Building 732, Version 7 0, January

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DOE, 2003c, RFCA Standard Operating Protocol for Recycling Concrete, Revision 1, Rocky Flats Environmental Technology Site, Golden, Colorado, June

DOE, 2003d, Automated Surface Water Monitoring Second Quarter FY03 (Jan -March 2003)

2.11 Projected Schedule

Characterization of IHSS Group 700-10 is expected to begin in the third quarter of FY 04

3.0 PUBLIC PARTICIPATION

ER RSOP Notification #04-07 activities were discussed at the January 2004 ER/D&D Status Meeting. This notification was provided to the local governments. This notification is available at the Rocky Flats Reading Rooms and on the EDDIE website at www.rfets.gov

4.0 REFERENCES

DOE, 1992-2003, Historical Release Reports for the Rocky Flats Plant, Golden, Colorado, June

DOE, CDPHE, EPA, 1996, Final Rocky Flats Cleanup Agreement, U S Department of Energy, Colorado Department of Public Health and Environment, and U S Environmental Protection Agency, Rocky Flats Environmental Technology Site, Golden, Colorado, July

DOE, CDPHE, EPA, 2003, Modifications to the Rocky Flats Cleanup Agreement Attachment, U S Department of Energy, Colorado Department of Public Health and Environment, and U S Environmental Protection Agency, Rocky Flats Environmental Technology Site, Golden, Colorado, June

DOE, 1999, RFCA Standard Operating Protocol for Recycling Concrete, Rocky Flats Environmental Technology Site, Golden, Colorado, September

DOE, 2000, Industrial Area Data Summary Report, Rocky Flats Environmental Technology Site, Golden, Colorado, September

DOE, 2001a, Industrial Area Sampling and Analysis Plan, Rocky Flats Environmental Technology Site, Golden, Colorado, June

DOE, 2001b, Final Source Evaluation Report for Point of Evaluation GS10 Water Years 2000-2001, RF/EMM/WP-01-003 UN, August

DOE, 2002, Final Annual RFCA Groundwater Monitoring Report, 02-RF-01873, November

DOE, 2003a, Environmental Restoration RFCA Standard Operating Protocol for Routine Soil Remediation, Rocky Flats Environmental Technology Site, Golden, Colorado, September

DOE, 2003b, Waste Stream and Residue Identification and Characterization – Building 732, Version 7.0, January

DOE, 2003c, RFCA Standard Operating Protocol for Recycling Concrete, Revision 1, Rocky Flats Environmental Technology Site, Golden, Colorado, June

DOE, 2003d, Automated Surface Water Monitoring Second Quarter FY03 (Jan -March 2003)

Figure 1
IHSS Group 700 10
PAC 700 1101
General Location

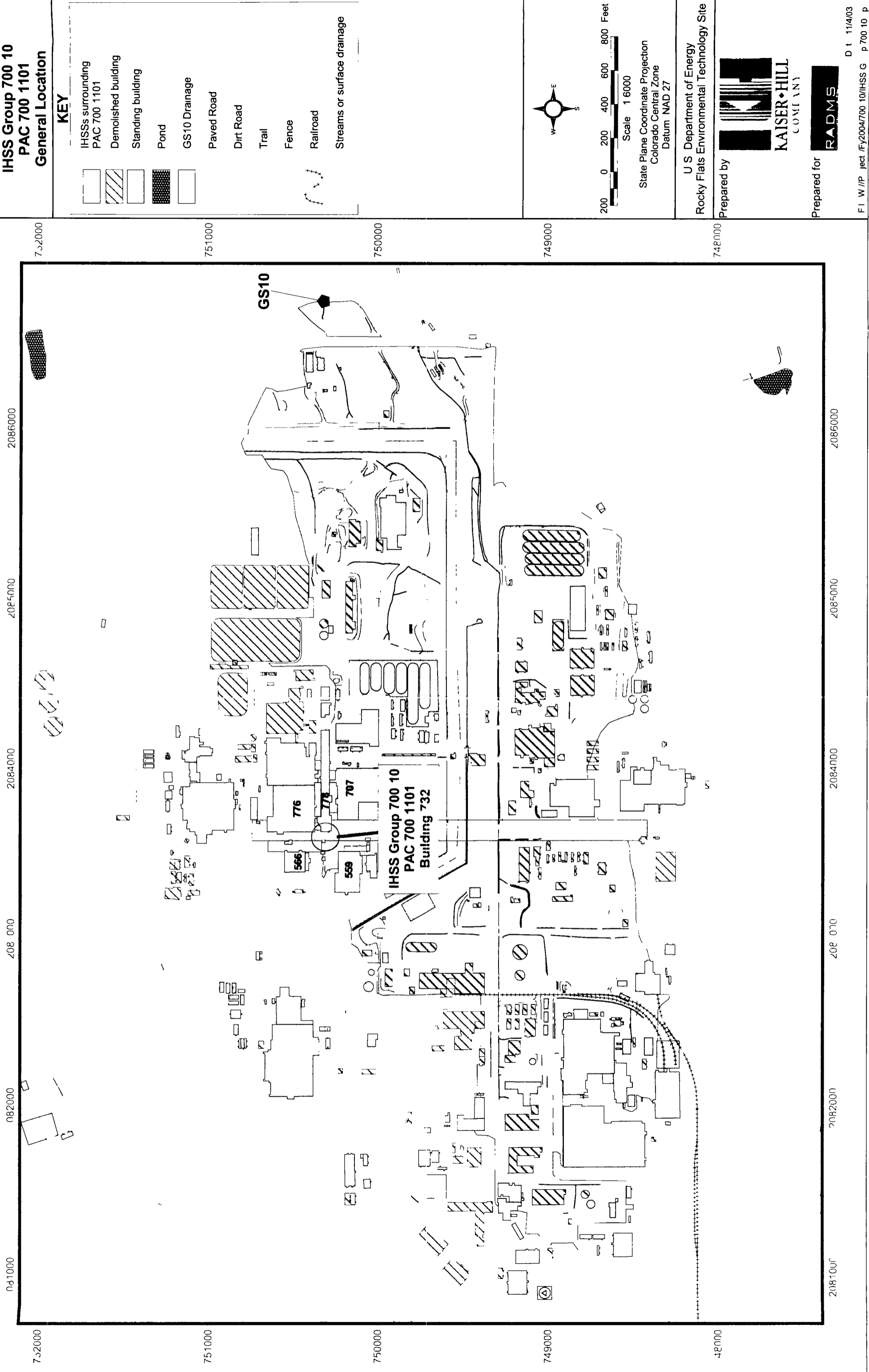
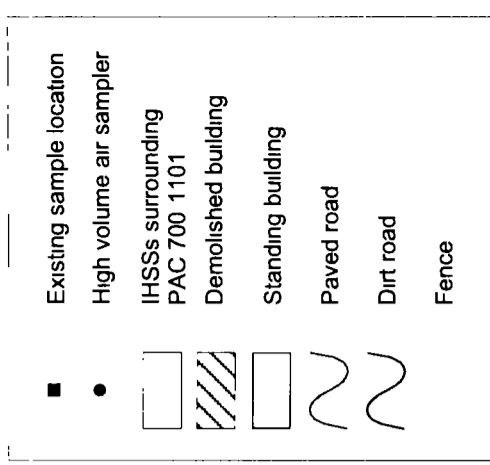


Figure 2

**IHSS Group 700 10
PAC 700 1101**

Potential Remediation Areas

KEY



Scale - 1 250

State Plane Coordinate Projection
Colorado Central Zone
Datum NAD 27

U S Department of Energy
Rocky Flats Environmental Technology Site

Prepared for



KAISER-HILL
COMPANY

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